



David Coon
212.390.9323
dcoon@selendygay.com

October 21, 2022

Via ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: *Malloy v. U.S. Department of State, et al.*, No. 19 Civ. 6533 (PGG)(JW);
Malloy v. Pompeo, No. 18 Civ. 4756 (PGG)(JW) – Letter Motion to Seal**

Dear Judge Gardephe:

We are limited *pro bono* counsel to Plaintiff in the above-referenced, consolidated matters. Pursuant to Rule II of the Court's Individual Rules of Practice and the Court's instructions in the October 21, 2022 telephone conference, we write to request permission to file Exhibit A to the October 5, 2022 Stipulation and Order of Settlement and Dismissal (the "Settlement Agreement") under seal. Defendants consent to Plaintiff's requested sealing.

In addition to information that must be redacted pursuant to Federal Rule of Civil Procedure 5.2, Exhibit A to the Settlement Agreement contains information requiring caution under Rule II of the Court's Individual Rules of Practice because it relates to Plaintiff's employment history and individual financial information.

Accordingly, Plaintiff respectfully requests leave to file Exhibit A to the Settlement Agreement under seal to avoid disclosure of information that may not be publicly filed pursuant to Rule II of the Court's Individual Rules of Practice.

Respectfully submitted,

SELENDY GAY ELSBERG PLLC

s/ David Coon

David Coon
Michael Duke
1290 Avenue of the Americas, 17th Floor
New York, New York 10104
Tel.: (212) 390-9000

Limited Pro Bono Counsel to Plaintiff Jane Malloy